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FOR INITIAL DISCLOSURES & COMBINED JOINT STATUS REPORT AND DISCOVERY PLAN - 1

STIPULATED MOTION TO EXTEND DEADLINES

[PROPOSED] STIPULATED ORDER GRANTING

Foley Agency 11-1-Proposed Stipulated Order Extend Deadline for Initial Disclosures & JSR.DOC The Honorable James L. Robart

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

MACHELL SHERLES, Successor Executor and Trustee in the Estate of Ann R. Rule, King County, Washington Probate Cause No. 15-4-04420-3 KNT

Plaintiff,

v.

FOLEY AGENCY, Inc. et al,

Defendants.

No. 2:18-cv-00016-JLR

[PROPOSED] STIPULATED ORDER GRANTING STIPULATED MOTION TO EXTEND DEADLINES FOR INITIAL DISCLOSURES & COMBINED JOINT STATUS REPORT AND DISCOVERY PLAN

(Clerk's Action Required)

All parties to this action, consisting of Plaintiff, Machell Sherles, the Successor Executor and Trustee of the Rule Estate; and the Defendants, Foley Agency, Inc., a New York corporation, and JoAnn Fox, a married individual, via their Stipulated Motion to Extend Deadlines for Initial Disclosures & Combined Joint Status Report and Discovery Plan ("Motion") stipulate to the entry of this Stipulated Order Granting Stipulated Motion to Extend Deadlines for Initial Disclosures & Combined Joint Status Report and Discovery Plan ("Order").

COOK & BARTLETT, PLLC

Attorneys at Law 1900 W. Nickerson St., Ste. 215 Seattle, WA 98119 Telephone: (206) 282-2710

Facsimile: (206) 282-2707

THEREFORE, IT IS SO ORDERED, ADJUDGED AND DECREED as follows:

By agreement of the parties and for good cause shown, the deadline for FRCP 26(a)(1) Initial Disclosures shall be April 2, 2018, and the deadline for FRCP 26(f) and Local Civil Rule 26(f) Combined Joint Status Report and Discovery Plan shall be April 9, 2018. The deadline for FRCP 26(f) Conference shall remain unchanged.

SO ORDERED, this 9th day of February, 2018.



SO STIPULATED AND AGREED:

DATED this 8th day of February, 2018.

DATED this 8th day of February, 2018.

Counsel for Plaintiff.

Counsel for Defendants.

LYNCH & FOLEY PC

COOK & BARTLETT, PLLC

s/ Rex B. Stratton

Rex B. Stratton, III, WSBA #1913; VBA #5683

Attorney for Plaintiff 7 Washington Street

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/s/ Diana S. Hill

Diana S. Hill, WSBA #36610

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and JoAnn Fox

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[PROPOSED] STIPULATED ORDER GRANTING STIPULATED MOTION TO EXTEND DEADLINES FOR INITIAL DISCLOSURES & COMBINED JOINT STATUS REPORT AND DISCOVERY PLAN - 2

Foley Agency

11-1-Proposed Stipulated Order Extend Deadline for Initial Disclosures & JSR.DOC

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STATUS REPORT AND DISCOVERY PLAN - 3

11-1-Proposed Stipulated Order Extend Deadline for Initial Disclosures & JSR.DOC

Certificate of Service

I hereby certify that on February 8, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following counsel of record for Plaintiff:

Rex B. Stratton, III Lynch & Foley PC 7 Washington Street Middlebury, VT 05753 rstratton@lynchandfoley.com

This 8th day of February, 2018 at Seattle, Washington.

/s/ Diana S. Hill

Diana S. Hill Cook & Bartlett, PLLC 1900 W. Nickerson St., Ste. 215 Seattle, WA 98119 T: (206) 282-2710

[PROPOSED] STIPULATED ORDER GRANTING STIPULATED MOTION TO EXTEND DEADLINES FOR INITIAL DISCLOSURES & COMBINED JOINT

COOK & BARTLETT, PLLC

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